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# Modern Slavery Statement 2020

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COLLGAR WIND FARM PTY LTD

 **COLLGAR**  
WIND FARM



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## DISCLOSURE NOTE

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This Modern Slavery Statement ("Statement") covers all entities owned or controlled by CWF Holdings Pty Ltd ("CWFH"), including the Reporting Entity Collgar Wind Farm Pty Ltd ("Collgar", "Collgar Wind Farm" or "the Company"), which is the operating entity of the project. The Statement addresses the risk of slavery, servitude, forced or compulsory labour, forced marriage, and human trafficking taking place in Collgar Wind Farm supply chains and business operations, pursuant to the Australian Modern Slavery Act 2018 (Cth) ("the Act").

Collgar Community Fund Pty Ltd ("CCF") is a Collgar subsidiary and the Trustee of Collgar Community Trust ("CCT" or "the Trust"), which receives an annual contribution from Collgar. Modern Slavery risks and impacts have not been assessed for CCF or CCT as their operations are limited to providing grants to local not-for-profit organisations to undertake projects and programs benefitting the local community. While strict assessment criteria exist for fund applications and grant approvals, this process has not been included in Collgar's Modern Slavery risk analysis. Collgar is undertaking further review of this process to ensure grant recipients align with Collgar's values in relation to Modern Slavery.

ACN 130 586 088 | Collgar Wind Farm Pty Ltd  
(the Reporting Entity)

## A MESSAGE FROM OUR CHAIRMAN AND CHIEF EXECUTIVE OFFICER

We are pleased to present Collgar's first Modern Slavery Statement. This demonstrates our commitment to addressing Modern Slavery and recognises that decisions we take within our sphere of influence can significantly affect the livelihoods of people and communities. The Statement outlines our journey to date and builds on our sustainability targets relating to human rights, health, safety and wellbeing, environment protection, social responsibility, and diversity. Each member of Collgar's Board and leadership team recognises our responsibility and the opportunity to prevent and address Modern Slavery risks.

Collgar is committed to identifying, assessing, and addressing Modern Slavery risks in our operations and supply chain. We understand this is key to running a sustainable business, and respecting human rights forms an integral part of Collgar's core values. These values are at the centre of our business operations and long-term strategic planning.

Over the past twelve months we have actively worked to identify and prioritise our operational and supply chain risks and develop our Modern Slavery Risk Management Action Plan and Roadmap. Guided by our Modern Slavery Policy we will continue to work closely with our suppliers and stakeholders to identify, manage and mitigate Modern Slavery risks into the future.

We are proud of the work undertaken by the Collgar team and we are committed to building on the foundation that we have established in our first reporting year. We are taking a continuous improvement approach to our Modern Slavery risk management program, which we expect to evolve over time as we and the business community learn more about the risks of Modern Slavery.

This Statement was approved by Collgar's Board and signed by the Chairman on 11 June 2021.



*Tony Iannello*  
Chairman



*Thomas Scott-Morey*  
Chief Executive Officer

**APPROVED**

A handwritten signature in blue ink that reads "Iannello".

**CHAIRMAN**

11 / 06 / 2021

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# Our Approach

Collgar's purpose is to sustainably provide and manage long term renewable energy assets. The Company's mission is to use proven technologies to safely develop and manage renewable energy investment projects for the long term. To achieve that we provide the following:

- Optimal financial returns to our shareholders
- Economic benefit to the communities we work in
- Reduction in carbon emissions for the benefit of the whole community



PROVIDE ENOUGH ELECTRICITY TO POWER 150,000 HOMES



RENEWABLE GENERATION EXPECTED TO TRIPLE BY 2040 WITH A STRONG UPTAKE IN WIND POWER



GREENHOUSE GAS REDUCTIONS EQUIVALENT TO TAKING 150,000 CARS OFF THE ROAD



GREENHOUSE GAS REDUCTIONS EQUIVALENT TO PLANTING 9,000,000 TREES



Collgar’s Modern Slavery Risk Management approach links closely to our purpose and company values:

Collgar’s Values	Modern Slavery Risk Management Approach
<p><b>Safety and Wellbeing</b></p> <p>Safety and wellbeing underpin all our endeavours. This applies to the environment, the community, our people and all those with whom we interact.</p>	<p>Our commitment to safety and wellbeing extends beyond our own operations to the people working within our extended supply chain – both nationally and internationally.</p>
<p><b>Honesty and Integrity</b></p> <p>We know that all relationships of value rely on being able to trust one another so we are scrupulously honest, upfront, and ethical in our dealings.</p>	<p>This expectation extends to our supply chain and we actively engage with our highest risk suppliers to maintain transparency and integrity throughout our operations.</p>
<p><b>Excellence</b></p> <p>We hold ourselves to the highest standards of performance in all we do, embedding this in our governance processes.</p>	<p>Our directors and leadership team ensure Modern Slavery risks are managed through good governance and effective due diligence processes. We aim to continuously improve our approach to Modern Slavery risk management.</p>
<p><b>Collaboration</b></p> <p>We actively promote an atmosphere of acceptance and welcome engagement with each other, our clients and our suppliers.</p>	<p>Effective management of Modern Slavery risks requires co-operation and sharing of information and approaches. We consider internal and external collaboration (with suppliers, industry bodies, government, and community) essential to an effective Modern Slavery risk management program.</p>
<p><b>Vigilance</b></p> <p>We pay rigorous attention to the identification and mitigation of potential risks whether physical, commercial, or environmental.</p>	<p>Our human rights due diligence process involves identifying and acting upon actual and potential risks to workers in our operations, supply chains and in the services we use. Where possible, our approach reflects the corporate responsibility to respect human rights as outlined in the UN Guiding Principles on Business and Human Rights.</p>
<p><b>Creativity</b></p> <p>We pride ourselves on finding innovative solutions to any problems that confront us and thinking outside the box when looking at opportunities for growth and improvement. We recognise that curiosity fuels creativity and we deliberately support open minded enquiry, making sure it is safe to share our evolving thoughts without fear.</p>	<p>We are committed to fostering a safe environment in which we explore the complex issues of Modern Slavery so that we continue to challenge our own assumptions, behaviours, processes, and approach.</p>

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## 2020 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

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In our first reporting year we established baselines, engaged our employees, and embedded Modern Slavery into our risk management and reporting framework. We established a Modern Slavery Working Group; undertook a gap analysis; developed a comprehensive Modern Slavery action plan and roadmap; engaged and educated our board, leadership team and employees; developed

and obtained board approval for our Modern Slavery Policy; updated our position descriptions to reflect Modern Slavery risk management responsibilities; identified and engaged our highest risk suppliers; and established accountability within our governance structure to ensure actions for measuring and reporting on Modern Slavery risks are documented, communicated and verified.

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## OUR PLANS FOR 2021

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In 2021 we will build on our Modern Slavery risk management initiatives and conduct further due diligence on our highest priority suppliers. We will further promote our Modern Slavery

Policy and expectations to our extended supply chain, and work with suppliers to develop and implement corrective action plans to address our collective Modern Slavery risks.

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## OUR PLANS BEYOND 2021

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We recognise that managing Modern Slavery risks requires ongoing commitment and we aim for continual improvement. We will extend our due diligence of suppliers and supply chain beyond those identified as highest risk and

monitor the appropriateness of our procurement practices. We will review, evaluate, improve, and evolve our risk management approach and ensure we strive towards best practice in our industry sector.

# About Us

## OUR STRUCTURE

Collgar Wind Farm is a medium-size Australian renewable energy business owned by the Retail Employees Superannuation Trust, through the holding company CWF Holdings Pty Ltd. Collgar’s annual consolidated revenue for the 2020 calendar year meets the reporting threshold as defined in the Act.

The wind farm is a renewable power project located 25km south-east of Merredin in Western Australia’s Central Wheatbelt. Built over a land envelope of 18,000 hectares (on land leased to the project by Merredin farmers), at the time of build it was the largest single-stage wind farm in the Southern Hemisphere.

Each year the wind farm generates and delivers clean, renewable electricity into the South West Interconnected System (SWIS), largely contributing to Western Australia’s greenhouse gas reductions.

The head office is in Perth, Western Australia and all employees and our customer base are also located in Western Australia.

The Collgar Community Trust, with Collgar Community Fund as Trustee, provides funding to local initiatives that benefit the Shire of Merredin. Neither entity generate revenue.

## OUR GOVERNANCE FRAMEWORK

Collgar’s corporate governance framework includes board responsibility for setting a culture that ensures we embed the protection of human rights into our business practices. This is achieved through board approved policies relating – directly or indirectly – to Modern Slavery.

The Audit and Risk Committee is accountable for ensuring Collgar maintains a robust and effective risk management program, which includes identifying, assessing, and mitigating the risk of Modern Slavery in our operations.

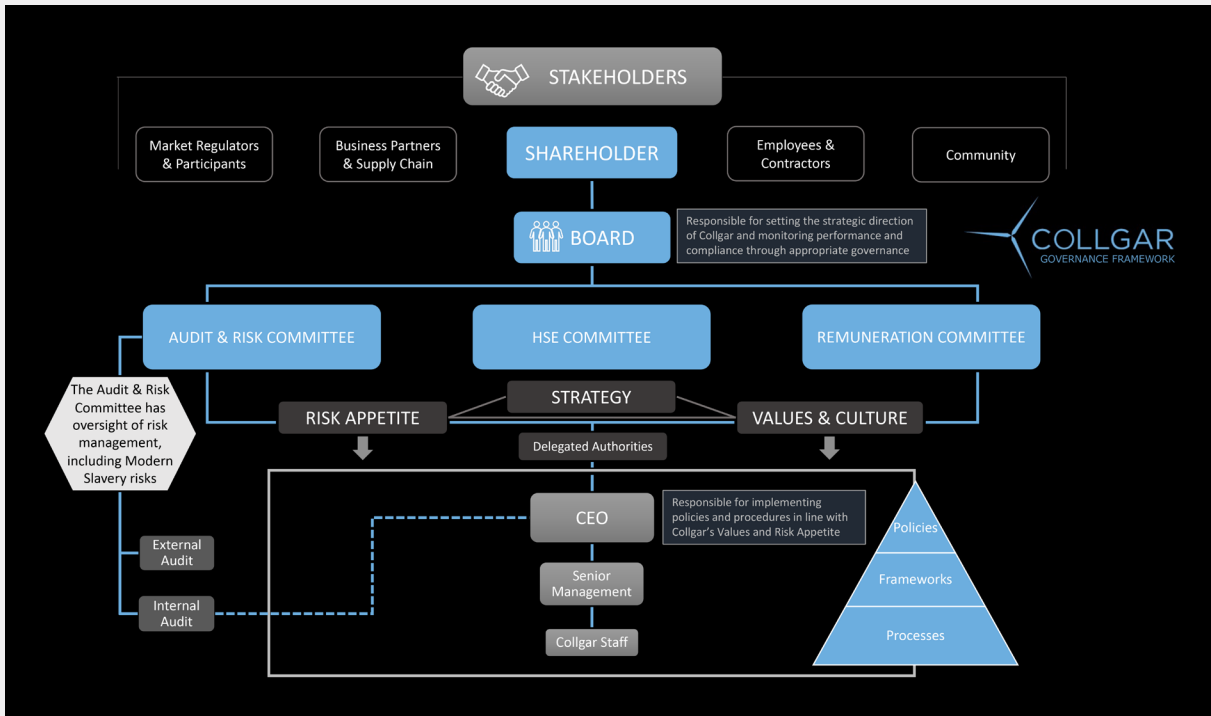
The leadership team lead by example and encourage employees to openly discuss and consider human rights issues. They are responsible for ensuring appropriate resources are available to deepen our understanding of Modern Slavery so we can detect and address, or even prevent, human rights violations within our operations and supply chain.

Collgar has created a Modern Slavery Working Group which meets quarterly to track the implementation of our action plan.









## OUR OPERATIONS

Collgar’s main operations include management of the wind farm’s site operations and maintenance activities while generating electricity and trading the energy into the market. During 2020 we employed a total of twelve permanent employees as well as casual employees and consultants who provided services and specialised expertise.

Throughout the project’s construction phase and now in the operational phase, community consultation and engagement remains a critical element. We ensure relevant stakeholders and the wider Merredin community are kept informed of project news through media coverage, website updates and information sessions.

## OUR SUPPLY CHAIN

Collgar has a very small supply chain, comprised of approximately 230 suppliers. Many of these suppliers are micro-businesses or sole traders with small annual spends across several procurement categories including:

- Construction and maintenance works
- Utilities
- Professional services
- Financial services
- Plant and equipment
- ICT

We have stable and long-term relationships with our suppliers, particularly those suppliers providing and maintaining our wind turbines; our energy retailers and electricity network providers; our legal, risk and finance consultants; our financial service providers; as well as suppliers of products and services used in our operations including IT equipment, personal equipment and clothing, and specialist wind farm equipment.

# Modern Slavery Risks at Collgar

## OVERVIEW

Our focus in 2020 was to enhance our understanding of Modern Slavery risks in our operations and supply chain.

### Operational risks

Facilitated by external consultants, Collgar participated in a Modern Slavery workshop and gap analysis.

The purpose of the workshop was to:

- Identify gaps in our systems and processes that may increase our exposure to Modern Slavery risks in our operations and supply chains
- Identify opportunities to improve and enhance our systems and processes, and

- Develop our Modern Slavery risk management action plan

### Supply Chain risks

We engaged external expertise to help us document, assess and prioritise our Tier 1 (direct) suppliers against Modern Slavery risk indicators, and identified our highest risk procurement categories. We focused on identifying our Tier 1 risks and assessing any existing operational processes to manage those risks.

We recognise this is an ongoing process and will undertake further due diligence of priority suppliers in 2021.

## Operational Risks

### OUR COVID-19 RESPONSE

We have closely monitored how the response to the pandemic has amplified Modern Slavery risks. The safety and wellbeing of our people, key stakeholders and the broader community is our priority. Given the escalating situation in Australia and globally, Collgar has introduced some precautionary measures to ensure business continuity, while managing the risks to employees and protecting community wellbeing.

The measures implemented abide with the Commonwealth and State laws and recommendations. We have encouraged employees to maintain social distancing and minimise unnecessary contact with stakeholders by using available technology and facilities to engage in normal business interactions. We have invested in COVID-19 related safeguards including PPE, hand sanitisers, face masks and

temperature check devices to protect our team and the broader community.

Collgar is very aware of the potential impact of COVID-19 on our extended supply chain. Collgar has worked with suppliers to maintain relationships and increase communication levels, to ensure no material changes occur to the delivery of services and equipment. We have taken a very deliberate approach when engaging with suppliers to ensure our operational needs do not place undue pressure on the extended supply chain. Finally, we have sought feedback from suppliers through a survey to further assist in identifying potential Modern Slavery risks, with the view of introducing more robust procurement arrangements targeted at addressing COVID-19 related risks.

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## OUR PEOPLE

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Collgar has a well-developed employment system, designed to provide flexibility and certainty for employees. Our team actively engage with subject-matter experts relating to employee relations, employment legislation, immigration, and whistleblower laws. This ensures hiring practices, workplace policies, treatment of employees and a variety of other factors comply with all relevant laws. Collgar conducts regular audits and reviews, to ensure

the Company's ongoing compliance in meeting applicable legislative and regulatory obligations.

Across our business we raise awareness, conduct training, and build capability so our people are aware of our policies and standards. Appropriate training supports the expectation that employees can identify and assess risks and are equipped to respond appropriately. All employees are required to complete Modern Slavery training.

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## MODERN SLAVERY GAP ANALYSIS

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With the support of external consultants, we conducted a Modern Slavery gap analysis to identify areas of improvement across five key categories:

- Management systems
- Human resources and recruitment
- Procurement and supply chain
- Risk management
- Customers and stakeholders

The analysis identified gaps and opportunities for better managing our response to Modern Slavery risks and human rights due diligence more broadly. We acknowledge that we are at the starting point of a journey and recognise that there is much work to do. This first year has enabled us to better understand the essential elements of an effective Modern Slavery risk management program, particularly in the context of our existing Environmental, Social, and Governance program.

**MODERN SLAVERY GAP ANALYSIS – continued**

The following table provides the results of our Modern Slavery gap analysis – conducted in late 2019 and again in late 2020, reflecting the significant improvements made during our first reporting year.

Category	Topic	Result (end 2019)	Result (end 2020)	Change
Management Systems	Governance	Starting out	Making progress	↑
	Commitment	Starting out	Leading practice	↑
	Business Systems	Starting out	Starting out	—
	Action Taken	Starting out	Starting out	—
	Monitor/Report	At the starting line	Starting out	↑
Risk Management	Risk Framework	Starting out	Making progress	↑
	Operational Risk	Starting out	Making progress	↑
	Identifying External Risk	At the starting line	Making progress	↑
	Monitoring & Reporting Risk	At the starting line	Making progress	↑
Procurement & Supply Chain	Policy & Procedures	At the starting line	Starting out	↑
	Contract Management	At the starting line	Starting out	↑
	Screening & Traceability	At the starting line	Starting out	↑
	Supplier Engagement	At the starting line	Starting out	↑
	Monitoring & Corrective Action	Starting out	Starting out	—
Human Resources & Recruitment	Awareness	At the starting line	Making progress	↑
	Policies and Systems	At the starting line	Making progress	↑
	Training	Starting out	Leading practice	↑
	Labour Hire/Outsourcing	At the starting line	At the starting line	—
Customers & Stakeholders	Customer Attitude	At the starting line	At the starting line	—
	Information Provision	At the starting line	Making progress	↑
	Feedback Mechanisms	At the starting line	Making progress	↑
	Worker Voice	At the starting line	At the starting line	—



**MODERN SLAVERY GAP ANALYSIS – continued**

As a small employer with a professional workforce, we consider the risk of Modern Slavery to be low within our direct business operations. However, we recognise that our employees and contractors will benefit from increased education around Modern Slavery risks, particularly in relation to supply chain and procurement practices. We also recognise that the risks of Modern Slavery are enhanced through our supply chain and other third-party relationships.

Importantly, our board and leadership team have committed material resources to identify and address Modern Slavery risks in our operations and supply chain.

Our Modern Slavery action plan and three-year road map, which was developed collaboratively with key representatives across our organisation has established a clear pathway for improvement.

**OUR POLICIES**

Collgar has several policies and processes to help identify and manage potential Modern Slavery and labour rights risks. The following policies reference our commitment to responsible and ethical business practices and protecting human rights generally.

Policy/Procedure	Purpose
<p><b>Modern Slavery Policy</b></p>	<p>Our Modern Slavery Policy provides a robust framework for managing Modern Slavery risks and ensuring compliance with the reporting requirements of the Act.</p> <p>The policy outlines our commitment to understanding, assessing and addressing Modern Slavery risks and potential impacts of our activities on the people working in our operations or extended supply chain; actively working to eliminate Modern Slavery practices from our operations, business partnerships and supply chain; and ensuring continuous improvement to enhance due diligence and transparency around reporting on Modern Slavery risks.</p> <p>Additionally, the policy aims to promote a culture where employees and contractors have the skills, support, and resources to carry out their Modern Slavery risk management responsibilities.</p> <p>Our Modern Slavery Policy was approved by Collgar’s Board which has overall accountability for ensuring the policy and its implementation complies with our business objectives and legislative reporting requirements.</p>

**OUR POLICIES – continued**

<p><b>Whistleblower Policy</b></p>	<p>Collgar encourages the reporting of any instances of suspected wrongdoing; unethical, illegal, fraudulent, suspicious, improper, or undesirable conduct involving our business, and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage, or reprisal.</p> <p>This policy ensures compliance with Australian workplace legislative framework including corporate governance, whistleblower, work, health &amp; safety, and employment legislation. It sets out the types of behaviours and conduct, which will be taken to constitute wrongdoing and 'Reportable Conduct', how to make a disclosure, to whom disclosures may be made, and how Collgar will address and manage disclosure reports.</p> <p>The policy is accompanied by guidance material for whistleblowers and Eligible Recipients of disclosures.</p>
<p><b>HSE Policy</b></p>	<p>This policy documents our commitment to providing a safe and healthy work environment in compliance with State and Federal work, health and safety legislation. This commitment to health and safety aims to build a culture that encourages everyone in the workplace to take responsibility for maintaining a safe and healthy workplace.</p> <p>The policy supports compliance with the Australian health and safety and employment framework.</p>
<p><b>Procurement Policy and Manual</b></p>	<p>Collgar is in the process of formalising its procurement practices in a Procurement Policy and Manual, which will set out Collgar's 'Procurement Principles' and 'Procurement Rules'. The principles and rules ensure effective processes are in place, appropriate governance controls are established, and capabilities and capacities identified.</p> <p>Collgar is updating material contracts by including specific clauses to address Modern Slavery risks.</p>

**SUPPLY CHAIN RISKS**

Collgar has a relatively high number (compared to overall supplier numbers) of medium and small suppliers (many of them micro businesses or sole traders) with small spends in the hundreds to tens of thousands of dollars. To provide a clearer picture of major sources of potential Modern Slavery risk, our initial supplier risk review excluded suppliers with whom we spend less than \$50,000, as well as small businesses or sole traders.

As such, we assessed 27 suppliers, who account

for approximately \$16.4 million (or 95%) of our annual procurement spend, against Modern Slavery risk indicators. High-level findings include:

- Construction and Maintenance Works makes up over 90% of high risk spend
- Two spend categories are potentially high risk for Modern Slavery
- Three key suppliers require further engagement and a greater level of due diligence

**SUPPLY CHAIN RISKS – continued**

Overall, our supplier risk analysis suggests, while there is potential Modern Slavery risk in our supply chain, only a very small number of suppliers and spend categories present the highest risk. These will continue to be our focus in 2021.

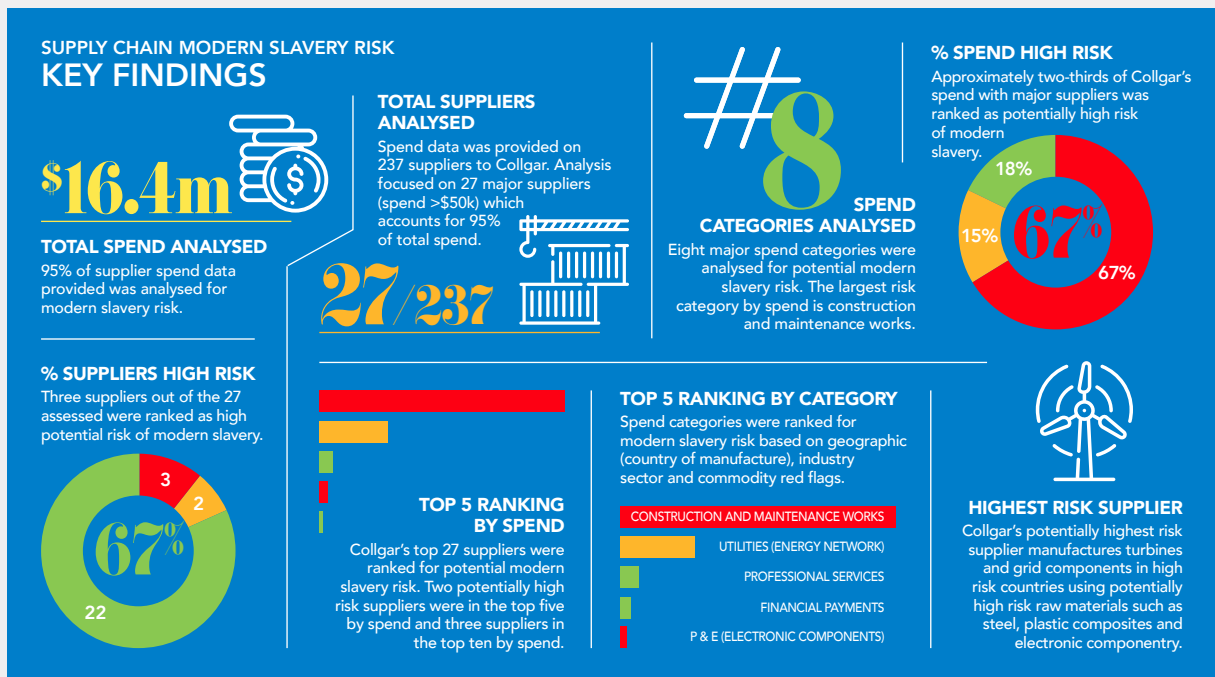
Our procurement team, supported by external experts, analysed the 27 suppliers for potential Modern Slavery risk, against four key risk indices:

- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor’s 2018 List of

Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials

- **Geographic location** – Based on estimated prevalence of Modern Slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers’ headquarters
- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low-skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘4D’ work (dirty, dull, degrading or dangerous)

The diagram below summarises our high-level Tier 1 supplier analysis:



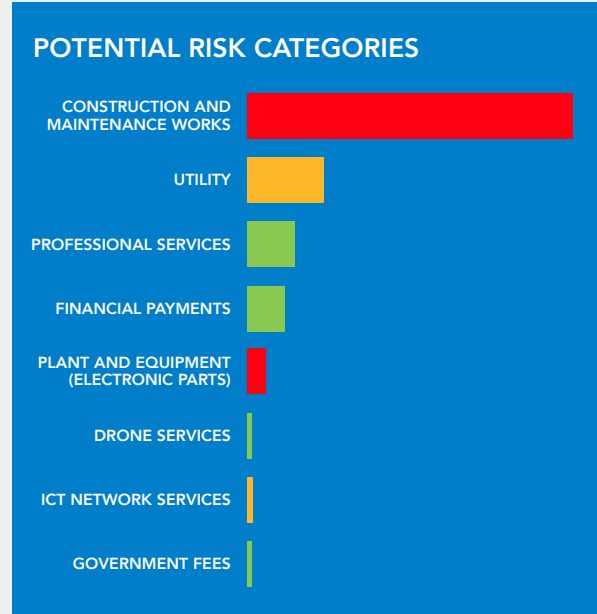


**SUPPLY CHAIN RISKS – continued**

We identified that almost all our potentially high risk spend is within two spend categories:

- Construction and maintenance
- Plant and equipment

Analysis of the 27 suppliers identified three suppliers as potentially high risk for Modern Slavery within these two supply categories. It must be noted that this analysis does not suggest that these suppliers are knowingly causing or contributing to Modern Slavery. They are however, in industry sectors or provide goods and services that are known to pose higher risks for Modern Slavery both in Australia and internationally. As such they are ranked as high potential risk and require further engagement and assessment.



Supply Category	Risk factors	Potential forms of slavery in extended supply chain
Construction and maintenance	<ul style="list-style-type: none"> <li>• Use of sub-contractors and labour hire in the building and construction sector</li> <li>• Use of building and construction components, structures and materials linked to modern slavery</li> <li>• Use of engineered component, accessories and supplies (cables, transformers, turbines etc) manufactured in high risk countries</li> </ul>	Debt bondage Forced labour Human trafficking Child labour
Electronics and networking equipment	<ul style="list-style-type: none"> <li>• Use of electronic components, structures and raw materials manufactured in high risk countries</li> </ul>	Debt bondage Forced labour Human trafficking Child labour

SUPPLY CHAIN RISKS – continued



While we intend to engage with all providers to understand Modern Slavery risks within their businesses, we have identified the following focus areas for 2020 and 2021:

- The regular purchases of complex electrical and technical equipment to help maintain and operate the wind farm. These components often contain cobalt, which is considered a high-risk product due to the geographical location of the product source
- Increased visibility around the manufacture of specialist wind farm equipment, including information outlining where the equipment is manufactured and assembled
- Delivery of equipment on-site in a rapid and cost-effective manner with minimal damage to goods. The highly competitive transportation market presents a potential risk to human rights





# Due Diligence and Action Plan

Addressing Modern Slavery risks is a complex and challenging process. Collgar's response will evolve over time as we continue to strengthen and refine our approach in future reporting cycles. We recognise the need to undertake human rights due diligence to identify, prevent, mitigate, and account for how we address actual and potential adverse human rights impacts in our operations and supply chains, including Modern Slavery.

Our Modern Slavery gap analysis guided the development of our Modern Slavery action plan and three-year road map. In 2020 we assessed and addressed our Modern Slavery risks as part of our initial due diligence approach.

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## MODERN SLAVERY ACTION PLAN AND ROAD MAP

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A cross-disciplinary team, which included members of our leadership team, worked collaboratively to develop a focused Modern Slavery action plan and a three-year road map. This includes actions for enhancing our approach to Modern Slavery governance, due diligence, risk and compliance; procurement and supply chain systems and processes; supplier engagement and monitoring; and broad awareness, training and communications.

During the reporting period the following actions were completed:

### MODERN SLAVERY WORKING GROUP

We established a Modern Slavery Working Group, including representatives from across our operations. The Working Group has been leading our Modern Slavery risk management program and the implementation of our action plan.

### MODERN SLAVERY GOVERNANCE

A Modern Slavery paper was presented to Collgar's Board to determine where our Modern Slavery program fits into the board reporting process. Future program updates will be provided to the Audit and Risk Committee on a quarterly basis. We will continue to build on our governance framework to ensure actions for measurement and reporting on Modern Slavery risks are documented, communicated, and verified. In late 2020, the board approved an

additional headcount for a governance manager. One of the governance manager's responsibilities is to manage the Modern Slavery risks within Collgar's risk management framework.

### MODERN SLAVERY POLICY

A stand-alone Modern Slavery Policy was developed to demonstrate our commitment to identifying, assessing, and addressing Modern Slavery risks in our operations and supply chain. Our policy provides a robust framework for managing these risks and ensuring compliance with the reporting requirements of the Act. The Policy was approved by Collgar's Board which has overall responsibility for ensuring the policy and its implementation complies with our business objectives and legislative reporting requirements.

## MODERN SLAVERY ACTION PLAN AND ROAD MAP – continued

### DOCUMENT REVIEW

We undertook a broad review of our policies and procedures and identified opportunities to incorporate Modern Slavery risk management into existing policy frameworks and operational processes. Policies and procedures will continue to be developed and/or refreshed.

### RISK MANAGEMENT FRAMEWORK

We undertook a comprehensive review and update of our Risk Management Policy and Framework and updated the risk assessment tools to account for Modern Slavery risks. The updated Framework was approved by our board in March 2020.

### POSITION DESCRIPTIONS

We reviewed and updated our position descriptions to better reflect Modern Slavery risk management roles, responsibilities, and accountabilities across the organisation. These were communicated to Collgar employees and outlined their responsibilities for developing, implementing and/or reviewing the organisation's Modern Slavery action plan.

### LEADERSHIP TEAM ENGAGEMENT AND TRAINING

Our Modern Slavery gap analysis workshop was the first step in engaging our leadership team. Since the initial engagement, we have continued to communicate progress to our leadership team and seek input and support on this important issue from across our business divisions.

To maintain our momentum and monitor the rollout of our program, Modern Slavery is a regular agenda item in monthly risk management meetings.

### TRAINING NEEDS ANALYSIS (TNA) AND STAFF AWARENESS TRAINING

Following the update of position descriptions, we undertook a TNA to identify the appropriate level of Modern Slavery training required by our employees. Training commenced in December 2020 and 73% of all employees have undertaken Modern Slavery e-Learning modules, with a total of 22 hours or 80 courses completed.

### SUPPLIER RISK IDENTIFICATION AND PRIORITISATION

We reviewed and prioritised our highest spend suppliers against Modern Slavery risk indicators and identified high-risk procurement categories and our potentially highest risk/highest priority suppliers.

### SUPPLIER ENGAGEMENT

We engaged our two highest priority suppliers on Modern Slavery risk management and have created a supplier web portal that includes an online Modern Slavery awareness presentation, fact sheet and FAQs. We will continue to engage these suppliers, work with them to assess their Modern Slavery risk management systems and processes and collaboratively develop and review corrective action plans.

### MODERN SLAVERY ROADMAP

Our focus for the first year was on reviewing existing systems and processes for managing operational and supply chain Modern Slavery risks, determining our highest risk/highest priority suppliers, and building a Modern Slavery risk management framework. Our second year will focus on implementing key actions and enhancing our due diligence processes for our priority suppliers. Our third year will focus on monitoring and reviewing progress as part of our commitment to continual improvement.

**MODERN SLAVERY ACTION PLAN AND ROAD MAP – continued**

**OUR THREE-YEAR MODERN SLAVERY ROADMAP**

<b>Year 1 (2020)</b> <b>Establish Framework and Implement Actions</b>	<b>Year 2 (2021)</b> <b>Undertake Supplier Due Diligence</b>	<b>Year 3 (2022)</b> <b>Review, Extend, Evaluate &amp; Improve</b>
<ul style="list-style-type: none"> <li>• Modern Slavery gap analysis building a baseline for reporting</li> <li>• Supplier risk prioritisation (Tier 1 suppliers)</li> <li>• Formalised Modern Slavery Working Group</li> <li>• Developed the Modern Slavery Action Plan</li> <li>• Engaged and educated leadership team and board</li> <li>• Commenced introductory training (eLearning) on Modern Slavery risks and reporting requirements</li> <li>• Engaged and educated highest risk suppliers on Modern Slavery risk management</li> <li>• Included Modern Slavery roles and responsibilities into position descriptions</li> </ul>	<ul style="list-style-type: none"> <li>• Publish Modern Slavery Policy on website</li> <li>• Incorporate Modern Slavery assessment into procurement due diligence process</li> <li>• Develop standardised supplier questionnaire</li> <li>• Conduct further due diligence of highest risk, highest priority suppliers (deep dive assessment)</li> <li>• Follow-up supplier questionnaires with corrective action plans</li> <li>• Include KPIs and contract evaluation criteria in supplier contracts</li> <li>• Incorporate Modern Slavery KPIs into supplier annual review process</li> <li>• Develop a Modern Slavery stakeholder engagement plan</li> <li>• Integrate Modern Slavery risk management into company strategic objectives</li> </ul>	<ul style="list-style-type: none"> <li>• Extend supplier risk assessments</li> <li>• Review and update action plan and strive for continuous improvement</li> <li>• Continue to review and report on Modern Slavery risk management initiatives</li> <li>• Formalise remedy and response pathway</li> </ul>



# Evaluation and Continuous Improvement

Increasing transparency around Modern Slavery issues will support awareness and recognition of Modern Slavery risks, providing us with the ability to improve overall workplace practices. To ensure we continue to assess the effectiveness of actions taken, we have implemented a comprehensive program review framework.

## ANNUAL REVIEW

On an annual basis Collgar's Board will review the Modern Slavery Statement and provide recommendations and strategic direction for Collgar to consider as part of its ongoing commitment to address risks.

We treat our risk register as a dynamic, living document. While it undergoes a formal review on an annual basis, the register is reviewed more frequently to align with our risk appetite and to continuously monitor risk treatment plans and effectiveness of controls. As and when Modern Slavery risks are identified and assessed these will form part of the review process.

## QUARTERLY REVIEW

Quarterly Review meetings involve members of the leadership team and operational employees who have accountability for dealing with our

supply chain, procurement, and contract management practices. The quarterly review focuses on assessing the effectiveness of planned Modern Slavery actions as well as the identification of other corrective action plans.

In addition, the Audit and Risk Committee is updated on the progress of Collgar's Modern Slavery action plan and initiatives.

## MONTHLY RISK MANAGEMENT MEETINGS

The Modern Slavery Working Group monitors and tracks implementation of the action plan and prepares key points for discussion.


## WEEKLY TEAM MEETINGS

The Collgar team has a weekly operational meeting to discuss key matters and this informal discussion is regularly used as a forum to raise Modern Slavery considerations in relation to business activities.



## EFFECTIVENESS INDICATORS 2020

During 2020, we developed a set of process indicators to track the implementation of our Modern Slavery risk management program. These are included below:

Indicator or target	In progress	Completed
Established Modern Slavery Working Group		
Board and leadership team engaged and updated regularly		
Implementation and tracking of action plan, with progress regularly reported to management		
100% of Year 1 Modern Slavery risk actions implemented		
100% of Tier 1 suppliers in high-risk categories engaged and educated		
Modern Slavery incorporated into enterprise risk management framework		
Gap analysis of existing procurement policies and procedures		
All employees provided with online Modern Slavery training <sup>1</sup>		
Modern Slavery responsibilities documented in relevant position descriptions		

<sup>1</sup> Completion rate at the end of 2020 was 73%

## CONTINUOUS IMPROVEMENT

Addressing Modern Slavery risk is complex and challenging. This Statement, which is our first statement under the Act, reports on the work we have completed in the first year of our Modern Slavery program. The work undertaken in 2020 was aimed at establishing a sound Modern Slavery risk management and reporting framework and raising awareness about Modern

Slavery among our employees, contractors, and service providers.

We are taking a continuous improvement approach to our Modern Slavery risk management program, and we expect to evolve as we, and the business community learn more about the risks of Modern Slavery in operations and global supply chains.

### CASE STUDY: ENGAGING OUR EMPLOYEES ON MODERN SLAVERY

Engaging and educating our people is an important component of our Modern Slavery Action Plan. In 2020 we aimed to raise awareness of the issue to lift its profile across Collgar and draw attention of its relevance to our business. Key elements of our engagement program include:

- Enabling Collgar's Board to make informed decisions by improving our ability to recognise and report on Modern Slavery implications
- Targeted training to increase understanding of our Modern Slavery risks
- Modern Slavery eLearning module offered to all employees
- Employee-led benchmarking assessments

### CASE STUDY: EMBEDDING MODERN SLAVERY INTO OUR RISK MANAGEMENT FRAMEWORK

Tailoring our risk management processes and tools for the context in which we operate is critical for enabling our team to recognise risks and deliver a consistent response in line with our risk appetite. We undertook a major revision of our risk management framework to provide the necessary context around Modern Slavery issues and impacts.

Key elements of the risk update include:

- Addition of a new risk category capturing key indicators for Modern Slavery risks
- Major revision of risk tables to enable consistent assessment of Modern Slavery risks, including specific examples and thresholds
- Assimilation of Modern Slavery risks into our existing monitoring, escalation, and reporting framework

# Collgar Community Fund

Development of the Collgar Wind Farm produced economic benefits for the Merredin region well before the first megawatt of electricity was generated. Scientists, planning consultants and company executives visited the area for several years during the development stage, utilising the local service sectors.

During the construction phase up to 200 jobs were created, and the wind farm continues to provide ongoing employment for a team of local people who operate and maintain the project.

There will be an ongoing financial boost to the community during the lifespan of the wind farm, through land related payments, community projects and Collgar Community Fund sponsorship.

Collgar Wind Farm Pty Ltd (Collgar) has a genuine interest in building the capacity and long-term sustainability of the communities in which it operates. The Collgar Community Fund (CCF), established by Collgar, provides funding to local initiatives that benefit the Shire of Merredin and surrounding areas. Since 2012, CCF has donated more than \$900,000 to Merredin and surrounding areas.

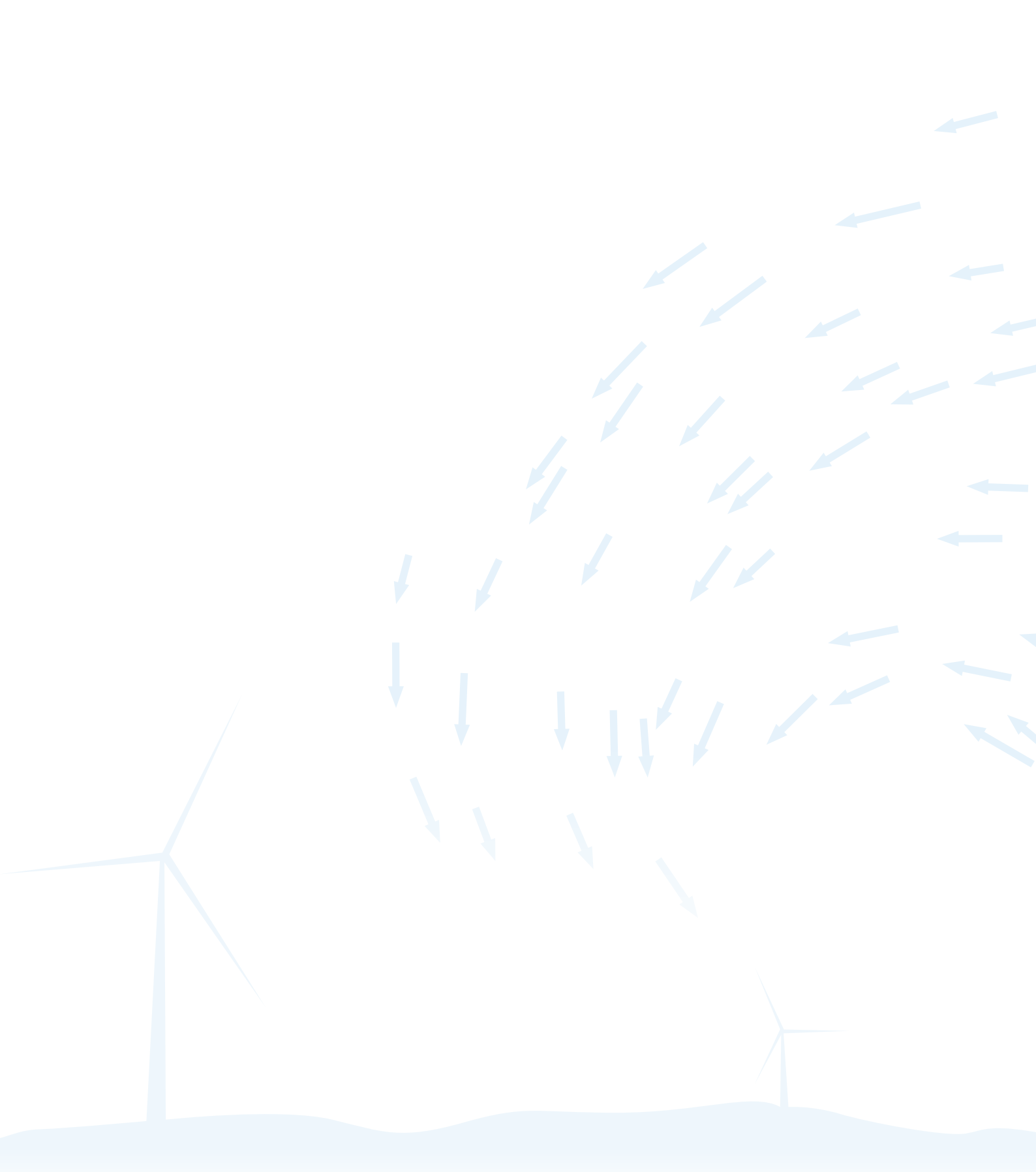
Through the CCF, Collgar supports initiatives that strengthen the local community through programs that make a positive and lasting contribution.

A Grants Committee has been appointed to assess applications and determine how best to allocate funds and in-kind contributions to maximise benefits for the community.

## OUR FOCUS AREAS

Preference for sponsorship will be given to initiatives that fall into one of the following priority areas:

- Education & Training
- Community Development
- Health & Wellbeing
- Environment



Visit us at [www.collgarwindfarm.com.au](http://www.collgarwindfarm.com.au)



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